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LFG NATIONAL CAPITAL, LLC, LAWFINANCE GROUP, INC., and
LFG SERVICING, LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

LFG NATIONAL CAPITAL, LLC,

Plaintiff,

v.

GARY, WILLIAMS, FINNEY, LEWIS,
WATSON & SPERANDO, P.L., WILLIE
GARY, and LORENZO WILLIAMS,

Defendants.

GARY, WILLIAMS, FINNEY, LEWIS,
WATSON & SPERANDO, P.L.,

Counterclaimant,

v.

LFG NATIONAL CAPITAL, LLC,
LAWFINANCE GROUP, INC., and
LFG SERVICING, LLC

Counterdefendants.

Case No. CV11-04538 PSG (PJWx)

**REQUEST FOR JUDICIAL NOTICE
OF LFG NATIONAL CAPITAL, LLC,
LAWFINANCE GROUP, INC., AND
LFG SERVICING, LLC IN SUPPORT
OF THEIR MOTION TO
DISMISS THE COUNTERCLAIMS
PURSUANT TO FED. R. CIV.
P. 12(b)(6)**

Hearing Date: September 12, 2011
Time: 1:30 p.m.
Judge: Honorable Philip S. Gutierrez
Courtroom: 880

REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MOTION TO DISMISS COUNTERCLAIMS

1 Plaintiff LFG National Capital, LLC and Counterdefendants LawFinance
 2 Group, Inc. and LFG Servicing, LLC, by and through its attorneys, hereby request that
 3 the Court take judicial notice pursuant to Federal Rule of Evidence 201 of the
 4 following documents listed below and attached hereto:

5
 6 a. “Cost Loan and Security Agreement,” executed on May 19, 2007,
 7 and the amendments thereto. The Cost Loan and Security Agreement, and
 8 amendments thereto, are referenced in the Complaint and in Defendant Gary,
 9 Williams, Finney, Lewis, Watson & Sperando, P.L.’s Counterclaim. A true and
 10 correct copy is attached as **Exhibit A**.

11
 12 The Court may take judicial notice of Exhibit A because “[d]ocuments whose
 13 contents are alleged in a complaint and whose authenticity no party questions, but
 14 which are not physically attached to the pleading, may be considered in ruling on a
 15 Rule 12(b)(6) motion to dismiss.” Brocato v. Dep’t of Corrections, 2009 WL
 16 3489367, at *4 (C.D. Cal. Oct. 26, 2009) (citing In re Stac Elec. Sec. Litig., 89 F.3d
 17 1399, 1405 n.4 (9th Cir. 1996)).

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 19 b. “California Department of Corporations Financial Services
 20 Division Licensee Address Listing of LawFinance Group, Inc.” The document
 21 is a screenshot of the website for the California Department of Corporations
 22 Financial Services Division Licensee Address Listing of LawFinance Group,
 23 Inc, taken on July 14, 2011, which can be found at [http://www.corp.ca.gov/
 24 FSD/licensees/default.asp?flag=1&srctyp=contains&licstatus=
 25 active&busname=lawfinance&id=&lictype=&city=&state=&zip](http://www.corp.ca.gov/FSD/licensees/default.asp?flag=1&srctyp=contains&licstatus=active&busname=lawfinance&id=&lictype=&city=&state=&zip). A true and
 26 correct copy is attached as **Exhibit B**.

The Court may take judicial notice of Exhibit B because, pursuant to Federal Rule of Evidence 201, judicial notice may be taken of “matters of public record,” see Lee v. City of Los Angeles, 250 F.3d 668, 689 (9th Cir. 2001), which includes “[r]ecords and reports of administrative bodies.” Barron v. Reich, 13 F.3d 1370, 1377 (9th Cir. 1994).

July 20, 2011

CHADBOURNE & PARKE LLP

By: /s/ Jay R. Henneberry
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